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Director

October 13, 2010

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Ex Parte Applications Filed by Qwest Communications International, Inc.
and CenturyTel, Inc. d/b/a CenturyLink For Consent to Transfer of Control,
WC Docket No. 10-110**

Dear Secretary Dortch:

The New Jersey Division of Rate Counsel ("Rate Counsel") hereby requests that Federal Communications Commission and the Wireline Competition Bureau (Commission/Bureau), as part of its review of the above transaction, issue the following suggested information requests attached hereto to Qwest Communications International, Inc. and CenturyLink, Inc. ("Joint Petitioners").

The suggested information requests relates to a number of broadband conditions that Rate Counsel has proposed in New Jersey. A copy of Rate Counsel's Testimony is attached hereto. Rate Counsel submits that the similar conditions are appropriate for consideration by the Commission/Bureau. The proposed information requests seek information on the cost to deploy broadband consistent with the National Broadband Plan.

Rate Counsel submits that Joint Petitioners should be asked by the Commission/Bureau to provide responses to the proposed information requests for each state where they operate in order to assist the Commission/Bureau in its review of the applications as it relates to the appropriate broadband commitments that should be imposed by the Commission/Bureau in order to find the proposed transaction furthers the public interest.

Please contact the undersigned if you have any questions regarding this matter.

Respectfully submitted,

STEFANIE A. BRAND
DIRECTOR, DIVISION OF RATE
COUNSEL

Christopher J. White

Christopher J. White, Esq.
Deputy Rate Counsel

SUGGESTED INFORMATION REQUESTS

1. Provide in detail: (a) what work would be involved for CenturyLink/Qwest to achieve and complete the Federal Communications Commission's National Broadband Plan in each state where they operate; and (b) an estimate or quantification of the cost to complete such achievement.
2. Provide in detail: (a) what work would be involved for CenturyLink/Qwest to deploy broadband capable of at least 4 mbps (download) in all exchanges in states where they operate the end of 2011; and (b) an estimate or quantification of the cost to meet this recommendation.
3. Provide: (a) information about the specific broadband speed limitations as they apply in each of CenturyLink/Qwest's wire centers in each state they operate.
4. Provide a detailed explanation as to why Qwest's best practice and "FTTN deployment is not reasonable to have CenturyLink do in states where CenturyLink operates.
5. Provide in detail: (a) what work would be involved for CenturyLink to offer in all states it now serves broadband capabilities at least as good as that offered in the Qwest footprint; and (b) an estimate or quantification of the cost to adopt and provide such service.
6. Provide: (a) an explanation of CenturyLink/Qwest's understanding of what constitutes "affordable broadband"; (b) an estimate or quantification of the cost to CenturyLink/Qwest to provide "affordable broadband service"; and (c) the income eligibility for any customer who would qualify for any "affordable broadband service" if CenturyLink/Qwest were to be required to provide "affordable broadband service".
7. Provide in detail: (a) what work would be involved for CenturyLink/Qwest to meet each of the following recommendations and (b) provide an estimate or quantification of the cost to meet each of these recommendations. The recommendations are:
 - Commit to 100% deployment of 4 mbps download and 1 mbps upload (actual, not simply advertised) in its territory by the end of 2011.
 - Set forth a plan for achieving the National Broadband Plan's long-term goals of download speeds of at least 100 Mbps and upload speeds of at least 50 Mbps by 2020, as well as the Plan's

“milestone” of 50Mbps/20Mbps by 2015.¹

- Freeze or lower its broadband rates in all states where they operate.
- Offer broadband service to Lifeline customers and to those with incomes up to 200% of the Lifeline income rate, at 50% of broadband prices.
- Offer stand-alone DSL, similar to that now offered by Qwest at rates that are less than the bundled offerings.
- Deploy FTTN to at least 10% of its households by the end of 2012; and
- Deploy IPTV to at least 10% of its households by end of 2012.

8. Provide in detail: (a) an explanation of what work would be involved if CenturyLink/Qwest were to offer “subsidized broadband service to income-eligible households;” (b) an estimate or quantification of the cost to implement this condition. Assume Lifeline income rate of 135% , 150% and 200%.

¹ / National Broadband Plan, at xiv, 9.